

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SONY BMG CD

TECHNOLOGIES LITIGATION

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Case No. 1:05-cv-09575-NRB

**DECLARATION OF LAWRENCE E. FELDMAN IN SUPPORT OF
PLAINTIFFS' APPLICATION FOR ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

Lawrence E. Feldman, declares as follows:

1. I am an attorney in good standing, duly licensed and admitted to practice in the Supreme Court of Pennsylvania (June 1981), Supreme Court of Massachusetts (December 1978), Eastern District of Pennsylvania (June 1981), Second Circuit Court of Appeals (March 2001), and Sixth Circuit Court of Appeals (February 2006). I am a principle of Lawrence E. Feldman & Associates, counsel of record for Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher, in *Ricciuti, et al. v. Sony BMG Music Entertainment Corp., et al.*, 05-cv-10190, S.D.N.Y., and for Robert Hull, Joseph Halpin, and Edwin Bonner in *Hull, et al. v. Sony BMG Music Entertainment Corp., et al.*, Case No. BC343385, Superior Court of California, L.A. County. A true and correct copy of the firm resume is attached hereto as Exhibit A and incorporated by reference herein.

2. I submit this declaration in support of Plaintiffs' application for attorneys' fees and reimbursements of expenses in the above-entitled matter. The testimony set forth in this declaration is based on first-hand knowledge, about which I would and could testify competently in open court if called upon to do so, and on contemporaneously-generated records kept in the ordinary course of business.

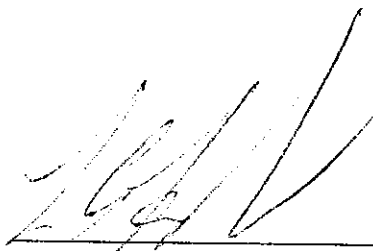
3. The total number of professional hours expended in the litigation by Lawrence E. Feldman & Assoc. is 197.77. The total lodestar amount for attorney, paralegal and professional staff time expended by Lawrence E. Feldman in the course of the litigation, based upon current rates, is \$79,547.00. The chart attached hereto as Exhibit B was prepared at my direction and represents a summary of the time spent from November 21, 2005, through March 30, 2006, on the litigation by attorneys, paralegals and professional staff of the firm. The chart includes the name of each attorney, paralegal and professional staff member who has worked on the case, his or her current hourly billing rate, and the number of hours expended by each professional on this

matter. The time reflected in this declaration was time actually spent, in the exercise of reasonable judgment, by the lawyers and staff involved, and includes factual investigation into the experience of, and client contact with, named plaintiff Mary Schumacher, assisting in the drafting of the complaints and subsequent motions, planning strategy with co-counsel, and disseminating notice of settlement to over 400,000 potential class members through its law firm website www.leflaw.com, and its other websites www.boycott-riaa.com and www.dmusic.com. My firm was careful not to expend unnecessary hours and not to duplicate work done by others.

4. The firm expended a total of \$47.57 in unreimbursed expenses in connection with prosecution of the litigation on behalf of Tom Ricciuti, Yvonne Ricciuti, Mary Schumacher, Robert Hull, and Joseph Halpin. The expenses incurred in this case are reflected in the books and records of the firm. These books and records are prepared from expense vouchers, check records, and other contemporaneously-recorded billing records, are an accurate record of expenses incurred in this litigation. The chart attached hereto as Exhibit B details these expenses.

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct.

Executed this 30 day of March, 2006, at Elkins Park, Pennsylvania.

A handwritten signature in black ink, appearing to read 'L. Feldman', is written over a horizontal line.

Lawrence E. Feldman